



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

N62661 AR 002165
NAVSTA NEWPORT RI
5090 3a

September 7, 2007

James Colter, P.E.
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Responses to EPA Comments on the Stone Revetment Replacement Design (30% Submission) for the Old Fire Fighting Training Area

Dear Mr. Colter:

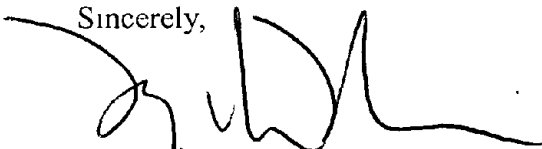
EPA reviewed the Navy's responses, dated August 13, 2007, to EPA's letter dated May 21, 2007, on the *Stone Revetment Replacement Design (30% Submission) for the Old Fire Fighting Training Area* dated April 2007. Detailed comments are provided in Attachment A.

Based on the Navy's response indicating that the eelgrass area would be re-surveyed before the next design submittal and the resubmittal schedule for the 30% design submission identified in the Navy's cover letter for these responses, it appears that the eelgrass beds have been re-surveyed. If correct, the survey should be included in the revised 30% design resubmittal.

Since the footprint of the revetment has changed, sediment contamination in excess of the preliminary remediation goals (PRGs) will remain. EPA expects the sediment contamination in excess of the PRGs to be addressed in the upcoming Feasibility Study for the site. Additionally, EPA must be assured that the revetment design will not cause mobilization of contaminated sediments through scouring.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,


Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3-3, §3.2.2	If during excavation for installation of the revetment evidence of contamination by any measure, not just visual, is evident in material that will be left in place then EPA expects an assessment of that area to be conducted. This may include a screening level assessment followed up by a more rigorous assessment if warranted by the screening results. Please edit the design document to reflect this requirement.
Drawing C:	d) It is not apparent from the cross-sections and plans provided in the 30% design that overtopping water would drain to the west. However, since the response states that this will be addressed, EPA will look for confirmation of this in future design information.
Attachment C	<p>b) The location of the discussion (under Design Toe Protection) and its context are not consistent with the response. Nevertheless, EPA accepts the clarification provided with the understanding that the five-foot minimum distance pertains to any intrusion including that which might be necessary for access to place any equipment including the portable dams. Therefore, if a ten-foot access distance is required around the limits of the portable dam flap to install it, then it shall be the outer limits of that distance and not the location of the end of the flap that determines where the required buffer begins for the eelgrass beds. As stated in earlier comments, placement of the revetment and indirect placement of the support structures (e.g., portable dams) must account for the accuracy of the location of the eelgrass beds. If the new survey is limited to a 15-foot accuracy, then the required buffer area will have to be increased by 15 feet to ensure protection of the eelgrass beds.</p> <p>d) EPA does not agree that bearing capacity and settlement can be assumed to be non-issues because the load from the new revetment is expected to increase significantly. Therefore, EPA expects the design to provide more than just a qualitative discussion of these issues. The design should document the types of bearing material present, provide capacities for these materials, and calculate the load that must be borne. The calculations shall confirm the acceptability of the bearing material with an appropriate safety factor and shall also evaluate settlement potential and properly account for settlement in the design.</p>